

July 13, 2022

Honorable Judge Dennis Montali
United States Bankruptcy Court
Northern District of California
450 Golden Gate Avenue, 16th Floor
San Francisco, California 94102

**RE: *In re PG&E Corporation and Pacific Gas and Electric Co.,
Case No. 19-30088 (DM) (Jointly Administered)
Related to Docket No. 12609***

Dear Judge Montali:

We represent the Trustee (the “Trustee”) of the Fire Victim Trust formed under the Joint Plan of Reorganization of the above-referenced Debtors (the “Debtors”). This letter is submitted in response to the letter dated July 7, 2022 filed by Interim Butte County Counsel Brad J. Stephens [Dkt. No. 12609] (the “Letter”).

As this Court is aware from the *Notice of Filing of Letter to Fire Victims on Behalf of the Fire Victim Trust* filed on June 21, 2022 [Dkt. No. 12528], former Trustee Justice John K. Trotter (Ret.) recently retired from his position with the Trust and was succeeded by Ms. Cathy Yanni as of July 1, 2022. Trustee Yanni has made significant efforts to address the concerns raised by Butte County and the Board of Supervisors. Following a June 10, 2022 call with Trustee Trotter and representatives of both Butte County and Paradise, Yanni, in her former role as Claims Administrator and on behalf of the Trust, has exchanged multiple emails and calls with participants of the June 10 call. On June 15, 2021, she responded to additional requests by emailing information regarding the Trust’s Medical Liens Resolution and Minors’ Compromise programs. On June 21, 2022, Yanni participated in a Zoom meeting with representatives of both Butte County and Paradise, including Doug Teeter (Butte County Board of Supervisors, District 5), Andy Pickett (Chief Administrative Officer, Butte County), Shelby Boston (Director, Butte County Department of Employment and Social Services), Brad Stephens (Interim Butte County Counsel), Steve Crowder (Mayor, Paradise), and Kevin Philips (Town Manager, Paradise). The June 21 meeting was productive and collaborative, and the group agreed to monthly meetings and a continued, open and cooperative dialogue going forward to accomplish mutual goals benefiting Fire Victims. The next meeting is scheduled for July 19, and the agenda Trustee Yanni received on July 7 includes questions the Board of Supervisors originally raised to Trustee Trotter. The Trust looks forward to a continued, productive engagement with the Board of Supervisors and others working on behalf of the Fire Victims.



The Trustee submits that the *Objection of Fire Victim Trustee to Motion of William B. Abrams Pursuant to Fed. R. Bankr. 2004 for Entry of an Order Authorizing Discovery and Hearings Regarding the Administration of the Fire Victim Trust* filed on behalf of the Trust on June 21, 2022 [Dkt. No. 12527] (the “Objection”) discloses ample information in response to Mr. Abrams’ motion beyond what the Trust is required to disclose and interested parties are entitled to receive under the Fire Victim Trust Agreement. In addition to its legal objections to Mr. Abrams’ requests, the Objection also provides a complete explanation of why some of the requests made by Mr. Abrams would not be helpful to any parties and would in fact be counter-productive to the Trust’s efforts to administer and make distributions on account of Fire Victim Claims as quickly as possible. The Trust awaits this Court’s direction with respect to the resolution of Mr. Abrams’s motion and will continue to comply with all disclosure requirements under the Fire Victim Trust Documents approved by this Court.

Very truly yours,

BROWN RUDNICK LLP

A handwritten signature in blue ink that reads 'Eric Goodman'.

Eric R. Goodman